

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

B.L.,	:	
	:	
Plaintiff,	:	Civil Action No. 3:15-CV-1327
	:	
v.	:	(Judge Mariani)
	:	
MARIROSA LAMAS, <i>et al.</i> ,	:	(Magistrate Judge Carlson)
	:	
Defendants	:	

**DOC DEFENDANTS' MOTION TO DISMISS AND FOR A MORE
DEFINITIVE STATEMENT**

DOC Defendants, by and through counsel, hereby move this Court, pursuant to Fed.R.Civ.P., No. 12(b)(6)(e), to grant the DOC Defendants' motion to dismiss and for a more definitive statement based on such grounds as set forth in the supporting brief.

Respectfully submitted,

By: /s/ Vincent R. Mazeski
Vincent R. Mazeski
Assistant Counsel
Attorney I.D. No. PA73795
Pennsylvania Department of Corrections
Office of Chief Counsel
1920 Technology Parkway
Mechanicsburg, PA 17050
(717) 728-7763
Fax No.: (717) 728-0307
Email: vmazeski@pa.gov

Dated: September 4, 2015

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	:	
Defendants	:	

CERTIFICATE OF NONCONCURRENCE

The undersigned, Vincent R. Mazeski, counsel for DOC Defendants, hereby certifies that Counsel for Plaintiff does not concur with the Court granting DOC Defendants' motion to dismiss.

Respectfully submitted,

By: /s/ Vincent R. Mazeski
Vincent R. Mazeski
Assistant Counsel
Attorney I.D. No. PA73795
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Defendants	:	

CERTIFICATE OF SERVICE

I hereby certify that I am this day depositing in the U.S. mail a true and correct copy of the foregoing Motion and Order upon Defendant, Rebecca Zong, 607 Belle Avenue, Boalsburg, PA 16827, and that this document has been filed electronically and is available for viewing and downloading from the ECF system by Counsel for Plaintiff and thus satisfies the service requirements under *Fed.R.Civ.P. 5(b)(2)(E)*; *L.R. 5.7*.

/s/Renee L. DiCarlo
Renee L. DiCarlo
Legal Assistant I
Pennsylvania Department of Corrections
Office of Chief Counsel
1920 Technology Parkway
Mechanicsburg, PA 17050
(717) 728-7763

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